

This filing is the CPNI Filing for 2010.

Comtel VoIP Privacy Policy

General

Comtel VoIP takes customer privacy and the confidentiality of customer business data very seriously. Comtel VoIP recognizes that its customers' communications system and configuration are critical to their businesses, and that customers must fully trust that system and the company that provide complete and ongoing security monitoring. This policy outlines the types of information Comtel VoIP may collect, and its commitment to keeping that information safe, secure and private.

Collection and Use of Customer Information

Comtel VoIP provides a service which enables customers to upload and store their system configuration information and call statistics data on Comtel VoIP servers and equipment. Comtel VoIP does not review, edit, monitor, disseminate, or use individual customer information, data or communications in any way, except to provide technical support, conduct monitoring, investigate a suspected Terms of Use violation or as may otherwise be required by law. Comtel VoIP may use aggregated usage statistics to assess system performance and scale. Comtel VoIP may use aggregated, non-identifiable usage statistics to assess system performance and scale.

No Monitoring of Customer Communications

Comtel VoIP does not monitor the content of any communication originated from or transmitted or received by its customers.

Maintenance of Optional Secure Connection to Comtel VoIP

In order to monitor the performance of customers' systems, provide customers with technical support and provide product enhancements and upgrades, Comtel VoIP, by default, maintains top level access to its customers' network and systems. Throughout the term of this agreement, Comtel VoIP may implement numerous security techniques to ensure the safety of customer data and system access and to minimize the risk of network intrusion.

Comtel VoIP Web Properties

Comtel VoIP may collect information from visitors to the Comtel VoIP.com web site, or any other web sites operated by Comtel VoIP. Comtel VoIP may collect the Internet addresses of Comtel VoIP site visitors. Comtel VoIP may use the information that it obtains from the Comtel VoIP website to both

improve its services, and help troubleshoot possible Comtel VoIP website problems. Comtel VoIP may also analyze non-identifying statistics that it collects from website visitor usage information, and provide this data to qualified third parties. Additionally, Comtel VoIP web properties may contain content from third-party content providers, although these content providers neither receive nor distribute Comtel VoIP user or customer information, nor do they receive user or customer information from Comtel VoIP.

Electronic and Physical Mailing Addresses

Comtel VoIP requires a valid, working e-mail address from customers upon initial account setup in order to send account information details, including account username and password information. If a customer does not wish to receive any further communications from Comtel VoIP after the installation process is complete, a customer may send a request to support@comtel.us. Removal from this list will significantly limit Comtel VoIP's ability to provide customer with technical support. In addition, Comtel VoIP may periodically communicate with customers regarding new products, product updates, and important Comtel VoIP news and information. Customers have the option to exclude themselves from these communications. If a customer would like to cease receiving communications from Comtel VoIP, the customer must send a request support@comtel.us with the subject line "UNSUBSCRIBE." Comtel VoIP will not sell or distribute customer e-mail or physical address to any third party, other than a) a qualified provider of services to Comtel VoIP who also subscribes to the terms of this Privacy Policy or b) with the customer's express permission, to a qualified Comtel VoIP partner upon the customer's request.

Cookies

Comtel VoIP sites use cookies to enhance the user's experience by allowing Comtel VoIP to recognize a user's return visit to Comtel VoIP's own services. Browsers are usually set to accept cookies. However, if a customer would prefer not to receive cookies, the customer may alter the configuration of its browser to refuse cookies. If a customer chooses to have its browser refuse cookies, it is possible that some areas of Comtel VoIP's site will not function as effectively, and the customer may be unable to log into Comtel VoIP's web-based administration tools, preventing the administration of the customer's system. Further, Comtel VoIP may use a third party to provide statistical analysis regarding its web users and may set cookies in order to gather the information needed to perform its statistical analysis. The information collected by the third party cookies does not contain any personal information and cannot be linked back to any individual user.

Log Files

Comtel VoIP uses and collects IP addresses to analyze trends, administer the site, and track users'

movement across the site, and may provide this data to qualified third parties to help Comtel VoIP improve the site and its service.

Links

Comtel VoIP's web sites may contain links to other sites. Please be aware that Comtel VoIP is not responsible for the privacy practices of such other sites. Comtel VoIP suggests that the users of Comtel VoIP products and services to be aware that when they leave urls under Comtel VoIP's control that they read the privacy statements of each and every web site that collects personally identifiable information. This privacy statement applies solely to information collected by Comtel VoIP web properties site or the Comtel VoIP application.

Surveys

From time-to-time Comtel VoIP's site requests information from users via surveys.

Participation in these surveys is completely voluntary and the customer therefore has a choice whether or not to disclose the information requested. Information requested may include contact information and demographic information. Survey information will be used for purposes of monitoring or improving the user experience and satisfaction level of customers or others accessing this site or the Comtel VoIP application.

Security

Comtel VoIP implements numerous security techniques to ensure the safety of customer data and system access. For customers accessing Comtel VoIP's site with 4.0 versions or higher of Microsoft Internet Explorer or Netscape Navigator browsers, customer information is encrypted and authenticated, using Secure Socket Layer (SSL) technology. The SSL systems provide data security for customers and customers' users, and the authentication ensures that customers' valuable content is available only to registered users, and is not accessible to unwanted parties. Each registered user in customer's organization will be provided with a unique username and password. Each time a user logs onto a customer's specific Comtel VoIP application, the recognized user can only be authenticated and allowed access using the correct username and password that has been assigned. A session will be issued for the limited purpose of capturing encrypted authentication data for the length of the session. Neither the username nor the password will be included in the session. Security protocols put into operation by Comtel VoIP are determined by encrypted session IDs as well as dynamic data.

Children's Privacy Policy

Comtel VoIP does not sell products or services for purchase by children. Comtel VoIP does not knowingly solicit or collect customer identifiable information from children or teenagers under the age of eighteen. In addition, Comtel VoIP will not knowingly link to any third party web site that solicits or collects customer identifiable information from minors. If a customer believes that a minor has disclosed personally identifiable information to Comtel VoIP, the customer must immediately contact Comtel VoIP at support@comtel.us so that the information can be removed.

Customer Responsibilities

Comtel VoIP promises to be extremely careful with any information customers entrust to us with, and Comtel VoIP expects that customers will do the same. This includes ensuring the physical and electronic security of the customer's network, as well as maintaining the privacy and confidentiality of the customer's own data, usernames and passwords.

Customer is also obligated, no less frequently than annually, to verify its contact information for those designated parties within Customer's organization who are able to make decisions about access to the Comtel VoIP system and its components. Only those individuals identified by Customer with these rights will be permitted to make changes to levels of access and security. Customer is obligated to provide Comtel VoIP with immediate notice once someone who has levels of access authority separates from Customer's employ so that system access is immediately denied. Absent such action by Customer, Comtel VoIP cannot be held responsible for access to customer data by unauthorized individuals.

Additional Information

If a customer has any questions about this Statement or the practices of the Comtel VoIP website, customer can contact Comtel VoIP at support@comtel.us.

Annual 47 CFR Section 64.2009(c) CPNI Certification

EB Docket 06-36

Annual 47 CFR Section 64.2009(c) CPNI Certification for 2010

Date Filed: March 1, 2011

Name of company covered by this certification: Comtel VoIP, Inc.

Form 499 Filer ID: 0019913508

Name of signatory: David Adams

Title of signatory: President, Comtel VoIP, Inc.

I, David Adams, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Federal Communications Commission against data brokers) against data brokers in the past year.

The company maintains a CPNI policy which is attached here.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: _____ David Adams_____

Date: _____ February 9, 2010 _____

Comtel VoIP, Inc. CPNI Compliance

Comtel VoIP, Inc. takes the protection of CPNI information very seriously. Although we have had no issues with customers or others which would require us to invoke the policies in place, we have drafted our policy to ensure compliance with the rules laid out in 47 CFR 64.2001 et seq. Our staff has been trained to respond to CPNI queries, although through the date of this signing no complaints have been received.

Specifically, any CPNI complaint or query call which comes in to our call center is directed to a designated individual who, by following established procedures, will follow a step-by-step process for

preserving the customer's rights while verifying the nature and validity of the complaint or concern. The designated individual will keep the company's senior management informed throughout the complaint/concern resolution process.

February 9, 2011